

1 E. BRENT BRYSON, LTD.  
2 E. BRENT BRYSON, ESQ.  
3 Nevada Bar No. 004933  
4 375 E. Warm Springs Road, Ste. 104  
5 Las Vegas, Nevada 89119  
(702) 364-1234 Telephone  
(702) 364- 1442 Facsimile  
Ebbesqltd@yahoo.com

6 *Attorney for Plaintiffs*

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9  
10 DANNY JACK HART, individually,

Case No.: 2:20-cv-00773-GMN-DJA

11 Plaintiff,

12 vs.

13 LOWE'S HOME CENTERS, LLC, a foreign  
14 corporation; STAN GARDENHIRE, an  
individual; JACK BUCHANAN, an  
individual; DOE INDIVIDUALS I-XX; and  
15 ROE ENTITIES I-XX,

**STIPULATION AND ORDER TO  
EXTEND TIME FOR PLAINTIFF TO  
FILE A RESPONSE IN OPPOSITION  
TO DEFENDANT'S MOTION FOR  
SUMMARY JUDGMENT**

16  
17 [FIRST REQUEST]

Defendants.

18 IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff, DANNY  
19 JACK HART, by and through his attorney, E. Brent Bryson, Esq. of E. Brent Bryson, Ltd., and  
20 Defendant LOWE'S HOME CENTERS, LLC, by and through its attorneys, Steven T. Jaffe, Esq.  
21 and Kevin S. Smith, Esq., of Hall Jaffe & Clayton, LLP, as follows:

- 22  
23 1. That Lowes filed its Motion for Summary Judgment on February 24, 2023 [ECF  
24 No. 57];  
25  
26 2. That the deadline for Plaintiff's response brief in opposition to Defendant's  
motion for summary judgment is March 10, 2023;  
27  
28

///

1           3. That Plaintiff's counsel, Mr. E. Brent Bryson, Esq., has experienced a death in his  
2 family;

3           4. That, therefore, there is good cause and the parties agree to extend the deadline  
4 for Plaintiff to file his brief in opposition to Defendant's motion for summary judgment by an  
5 additional fourteen (14) days beyond the current due date of March 10, 2023, until March 24,  
6 2023.

7           5. That this is the first request to extend Plaintiff's response deadline and is not  
8 being made for the purpose of delay.

9  
10 DATED this 10<sup>th</sup> day of March, 2023.

11 E. BRENT BRYSON, LTD.

12           /s/ E. Brent Bryson  
13           E. Brent Bryson Esq.  
14           Nevada Bar No. 004933  
15           ebbesqltd@yahoo.com  
16           375 E. Warm Springs Road,  
17           Suite 104  
18           Las Vegas, NV 89119  
19           *Attorneys for Plaintiff,*  
20           *Danny Jack Hart*

21           DATED this 10<sup>th</sup> day of March, 2023.

22 HALL JAFFE & CLAYTON, LLP

23           /s/ Kevin S. Smith  
24           STEVEN T. JAFFE, ESQ.  
25           Nevada Bar No. 007035  
26           sjaffe@lawhjc.com  
27           KEVIN S. SMITH, ESQ.  
28           Nevada Bar No. 007184  
29           ksmith@lawhjc.com  
30           7425 Peak Drive  
31           Las Vegas, Nevada 89128  
32           *Attorneys for Defendant,*  
33           *Lowe's Home Centers, LLC*

## **ORDER**

Based on the stipulation of the parties and with good cause shown, the Court orders as follows:

**IT IS SO ORDERED** that the deadline for Plaintiff to file a response brief in opposition to Defendant's Motion for Summary Judgment is extended fourteen (14) additional days beyond the current due date of March 10, 2023, until March 24, 2023.

DATED this 10 day of March, 2023.

UNITED STATES DISTRICT COURT JUDGE

Respectfully Submitted By:

E. Brent Bryson, Ltd.

/s/ E. Brent Bryson  
E. Brent Bryson Esq.  
Nevada Bar No. 004933  
375 E. Warm Springs Road  
Suite 104  
Las Vegas, NV 89119  
(702) 364-1234 Telephone  
*Attorneys for Plaintiff,  
Danny Jack Hart*